

**FILED**

JUN 26 2015

DAVID CREWS, CLERK  
BY D. Adams Deputy

UNITED STATES DISTRICT COURT FOR  
NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:15CR070

JIXIAN ZHU and DONG LIN

18 U.S.C. § 371

18 U.S.C. § 1029(a)

18 U.S.C. § 2

**The Grand Jury Charges:**

**COUNT ONE**

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, JIXIAN ZHU and DONG LIN, did knowingly and willfully conspire with each other and other persons, both known and unknown to the grand jury, to use one or more counterfeit access devices with intent to defraud, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that JIXIAN ZHU and DONG LIN would and did obtain false and fraudulent credit and debit cards wherein the account number shown on the front of the card did not match the account number listed on the magnetic stripe on the back of the card. When the fraudulent card was used, it would charge the account listed on the magnetic stripe, which account did not belong to either of the defendants and for which neither of the defendants had authorization to use. The defendants used one or more of the fraudulent credit and debit cards to purchase Amazon and Macy's gift card from the Lowe's Home Improvement stores in New Albany and Tupelo, Mississippi.

### **Overt Acts**

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were caused and committed on or about the dates alleged below in the Northern District of Mississippi and elsewhere, by at least one of the co-conspirators herein:

a. On or about June 4, 2015, JIXIAN ZHU entered the Lowe's Home Improvement store in Tupelo, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.

b. On or about June 4, 2015, DONG LIN entered the Lowe's Home Improvement store in Tupelo, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.

c. On or about June 4, 2015, JIXIAN ZHU entered the Lowe's Home Improvement store in New Albany, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.

d. On or about June 4, 2015, DONG LIN entered the Lowe's Home Improvement store in New Albany, Mississippi and used one or more fraudulent credit or debit cards in an attempt to purchase either Amazon or Macy's gift cards, or both

All in violation of Title 18, United States Code, Section 371.

### **COUNT TWO**

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, JIXIAN ZHU and DONG LIN, aided and abetted by each other and by others both known and unknown to the grand jury, did knowingly and willfully, with intent to defraud, use one or more counterfeit access devices to purchase or attempt to purchase Amazon and Macy's

gift cards from the Lowe's Home Improvement store in New Albany, Mississippi, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a) and 2.

**COUNT THREE**

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, JIXIAN ZHU and DONG LIN, aided and abetted by each other and by others both known and unknown to the grand jury, did knowingly and willfully, with intent to defraud, use one or more counterfeit access devices to purchase or attempt to purchase Amazon and Macy's gift cards from the Lowe's Home Improvement store in Tupelo, Mississippi, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a) and 2.

**A TRUE BILL:**

/s/ Signature Redacted  
**FOREPERSON**

*First Asst.*  
  
**UNITED STATES ATTORNEY**